

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**JOINT MOTION TO MODIFY THE COURT'S  
AMENDED ORDER SETTING PRETRIAL DATES AND DEADLINES**

1. On June 21, 2024, the parties filed a Joint Motion to Amend the Court's Order Setting Pretrial Dates and Deadlines. ECF No. 869. In addition to requesting adjustments to preexisting deadlines, the motion proposed several deadlines not reflected in the Court's February 26th Scheduling Order, including deadlines for exchanging reply ("fairness") designations.

2. On June 24, 2024, the Court granted the parties' Joint Motion to Amend the Court's Order Setting Pretrial Dates and Deadlines. ECF. No. 871.

3. As set forth in the Order, the deadline for parties to exchange fairness designations is July 26, 2024. Separately, the deadline for any party or non-party to file an objection to the public use of confidential documents or testimony is also July 26, 2024 ("confidentiality objections").

4. Due to the overlapping deadlines for confidentiality objections and fairness designations, parties and non-parties will not have an opportunity to assert confidentiality objections, if any, to a party's fairness designations.

5. Accordingly, the parties jointly move to modify the Court's June 24th Order to permit parties and non-parties to file confidentiality objections to fairness designations by **July 31, 2024**.

6. The parties submit that good cause exists to amend the Court's Order setting pretrial dates and deadlines, as the parties have proceeded diligently in this matter, no party will be prejudiced by the requested relief, and the requested relief will not affect the trial start date or other deadlines. *See generally Roe v. Howard*, No. 1:16-cv-562, 2017 U.S. Dist. LEXIS 187258, \*1-2 (E.D. Va. June 30, 2017).

7. The parties have met and conferred regarding the relief requested herein, and both Google and Plaintiffs join in this motion.

Dated: July 18, 2024

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